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May 22, 2025

VIA ECF

The Honorable Arun Subramanian
United States District Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Senior v. Forum Health & Personal Care, LLC*
Case No.: 1:25-cv-1473

Dear Judge Subramanian,

The undersigned represents Frank Senior, on behalf of himself and all other persons similarly situated ("Plaintiff") in the above referenced matter against Defendant, Forum Health & Personal Care, LLC ("Defendant"). The undersigned respectfully requests that the Initial Conference scheduled for June 5, 2025, at 2:00 PM (Dkt. 6) be adjourned for 60 days because the Defendant has not yet answered or appeared in this action. This request will grant ample time for the Defendant to appear and discuss a possible resolution with Plaintiff's Counsel. The undersigned also respectfully requests the Defendant's Answer deadline be extended by 30 days. This is the Plaintiff's first request for an extension.

DENIED. If defendant has not answered or appeared by the deadline to do so, plaintiff should take the appropriate steps to seek a default judgment. The Clerk of Court is respectfully directed to terminate the motion at ECF No. 8.

Respectfully submitted,

GOTTLIEB & ASSOCIATES PLLC

/s/Michael A. LaBollita, Esq.
Michael A. LaBollita, Esq.

SO ORDERED.



Arun Subramanian, U.S.D.J.
Date: May 22, 2025